

# CLARK HILL

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June 19, 2017

*Via U.S. Mail*

Regional Freedom of Information Officer  
U.S. EPA, Region 5  
77 West Jackson Boulevard (MI-9J)  
Chicago, IL 60604

**Re: Freedom of Information Act Request**

To Whom It May Concern:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, and implementing regulations found in Part 2 of Title 40 of the Code of Federal Regulations, please provide copies of the following records in the custody or control of the Environmental Protection Agency ("EPA" or "Agency") between January 1, 2012 and the present:

1. All records concerning 312 Ellsworth Avenue, Grand Rapids, Michigan;
2. All records concerning 26000 Capitol Avenue, Redford, Michigan (note that this address is also often listed as 26000 Capitol Avenue, Detroit, Michigan);
3. All records concerning 12886 Eaton Avenue, Detroit, Michigan; and
4. All records concerning 2537 West Le Moyne Avenue, Melrose Park, Illinois.

Please search for responsive records regardless of format, medium, or physical characteristics. Please produce records electronically in PDF or TIF format on a CD-ROM, organizing and identifying such records by the date on which they were originally created.

If, for some reason, you believe any portion of the requested records is exempt from disclosure, please provide an index of those documents, including the applicable exemption. If you believe that some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable, non-exempt portions of the requested records. If it is your position that a document contains non-exempt portions of records and that those non-

June 19, 2017

Page 2

exempt portions are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt and how the material is dispersed throughout the document.

Pursuant to the FOIA, we agree to reimburse the Agency for reasonable charges incurred to search and copy these documents, upon presentation of an invoice with the finished copies. If it is anticipated that such search and production fees will exceed \$500.00, please contact me in advance to obtain consent to such charges. If you have any questions concerning this request, please do not hesitate to contact the undersigned at (202) 572-8671 or by e-mail at [cclare@clarkhill.com](mailto:cclare@clarkhill.com); or Kenneth von Schaumburg at (202) 772-0904 or [kvonschaumburg@clarkhill.com](mailto:kvonschaumburg@clarkhill.com).

Thank you in advance for your assistance.

Sincerely,

CLARK HILL PLC

  
for : Christopher B. Clare

cc: Kenneth von Schaumburg, Esq.